UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE PHARMACEUTICAL INDUSTRY AVERAGE WHOLESALE PRICE LITIGATION	MDL No. 1456
	CIVIL ACTION: 01-CV-12257-PBS
THIS DOCUMENT RELATES TO:	Judge Patti B. Saris
State of Nevada v. American Home Products, et al., CA No. 02-CV-12086-PBS	
State of Montana v. Abbott Labs., Inc., et al. D. Mont. Cause No. CV-02-09-H-DWM	

[PROPOSED] STIPULATION AND ORDER

IT IS HEREBY STIPULATED, by and between the undersigned, that Case management Order No. 25 should be amended as follows:

Defendants' Expert Reports on Liability	September 21, 2006
Motions for Summary Judgment	September 21, 2006
Oppositions to Motions	November 1, 2006
Replies	November 15, 2006
Sur-replies	November 22, 2006
Hearing	To Be Determined

HAGENS BERMAN SOBOL SHAPIRO LLP

/s/ Jeniphr Breckenridge ______________
Steve W. Berman
Jeniphr Breckenridge
Hagens Berman Sobol Shapiro LLP
1301 Fifth Avenue, Suite 2900
Seattle, WA 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594

Thomas M. Sobol (BBO#471770)
Hagens Berman Sobol Shapiro LLP
One Main Street, 4th Floor
Cambridge, MA 02142
Telephone: (617) 482-3700
Facsimile: (617) 482-3003

On behalf of the State of Nevada and the State of Montana

HOGAN & HARTSON, LLP

/s/ Steven M. Edwards ______________
Steven M. Edwards
Hogan & Hartson, LLP
875 Third Ave., Suite 2600
New York, NY 10022
Telephone: (212) 918-3000
Facsimile: (212) 918-3100

On behalf of Defendant Bristol-Myers Squibb

Dated: July ___, 2006

SO ORDERED: ____________________________________
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that I, Steve W. Berman, an attorney, caused a true and correct copy of the foregoing **[PROPOSED] STIPULATION AND ORDER**, to be delivered to all counsel of record by electronic service pursuant to Paragraph 11 of the Case Management Order No. 2, by sending on July 25, 2006, a copy to LexisNexis File & Serve for Posting and notification to all parties.

By **/s/ Steve W. Berman**

Steve W. Berman
HAGENS BERMAN SOBOL SHAPIRO LLP
1301 Fifth Avenue, Suite 2900
Seattle, WA 98101
(206) 623-7292